

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:18-CV-11780

JAMES DELTUFO  
PLAINTIFF

V.

DONALD M. DELANEY  
AND WILLIAM R. CUSHING JR.  
DEFENDANTS

**PLAINTIFF'S OPPOSITION TO MOTION IN LIMINE TO PRECLUDE  
REFERENCE TO PRIOR INCIDENCES OF ALLEGED MISCONDUCT**

Now comes the plaintiff in the above-entitled action and gives notice of his opposition to the defendants' Motion in Limine to Preclude Reference to Prior Incidences of Alleged Police Misconduct. In support of the above the plaintiff says that the testimony referred to by the defendants explains the plaintiff's action leading up to his arrest. Without such testimony the jury will likely infer much more sinister motives on the part of the plaintiff in evading being stopped by the police while driving and evading arrest. The objections of the defendants can be effectively dealt with through a limiting instruction.

WHEREFORE the plaintiff submits that the defendants' motion should be denied.

By his attorney,  
/s/Chester L. Tennyson, Jr.  
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Dated: January 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed with the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on the date indicated below.

/s/Chester L. Tennyson, Jr

Dated: January 6, 2021